

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

ALFRED CHESTNUT, *et al.*

Plaintiffs,

v.

DONALD KINCAID, *et al.*

Defendants.

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Civil Action No. LKG 20-2342

**INDIVIDUAL DEFENDANTS' MOTION FOR LEAVE TO FILE SUPPLEMENTAL  
AUTHORITY**

Individual Defendants Donald Kincaid and Bryn Joyce, by and through their undersigned counsel, Nathan & Kamionski LLP, respectfully move this Court for leave to file newly issued supplemental authority in support of their Motion for Summary Judgement (ECF 196).

1. Defendants filed a Motion for Summary Judgement and accompanying briefing on September 6, 2022, ECF 196, and Plaintiffs filed an Opposition on October 14, 2022. ECF 202. Defendants filed a Reply on November 18, 2022, ECF 207, and Plaintiffs filed a Surreply on December 5, 2022. ECF 211.
2. Since then, on April 12, 2023, another court in this District issued an opinion addressing substantively similar claims to some of those before this Court. *See Gary Washington v Baltimore Police Dep't., et al.*, No. 1:19-cv-02473 SAG, (D. Md. Apr. 12, 2023) (granting summary judgment on § 1983 claims alleged following a reversed homicide conviction).
3. In granting the officer defendants' motion for summary judgement in *Washington*, Judge Gallagher addressed many of the *Brady* issues presented in the briefing pending before this Court. *See id.* at 29-33.

4. Defendants respectfully seek leave to file Judge Gallagher's opinion as persuasive supplemental authority. The memorandum opinion is attached to this Motion as Exhibit 1.

WHEREFORE, Defendants respectfully request this Court GRANT their Motion for Leave to File Supplemental Authority.

Dated: April 20, 2023

Respectfully submitted,

/s/

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*Donald Kincaid, Jr. & Bryn Joyce*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 20, 2023, I caused the foregoing document to be electronically filed with the Court's CM/ECF system, which will send an electronic copy of the same to all counsel of record.

/s/ Mayer Engelsberg